

AVTEX FIBERS, INC.  
ADMINISTRATIVE RECORD FILE \*  
INDEX OF DOCUMENTS

I. SITE IDENTIFICATION

1. Contamination Potential Form, re: Avtex Fibers, Inc., 7/15/80. P. 100001-100001.
2. Memorandum to U.S. EPA, from N. C. Elphick, FMC Corporation, re: Transmittal of Notification of Hazardous Waste Site forms, 6/2/81. P. 100002-100004. The Notification forms are attached.
3. Memorandum to Mr. Thomas Voltaggio, U.S. EPA, from Mr. Jeffrey Alper, U.S. EPA, re: Concerned citizen's discovery of suspected contamination in ground water, 10/13/83. P. 100005-100005.
4. Letter to Mr. Darius [sic] Ostrauskas, U.S. EPA, from Mr. K.R. Hinkle, Virginia State Water Control Board, re: Presentation summarizing water pollution problems in Front Royal, Virginia, 10/19/83. P. 100006-100009. A report entitled "State Presentation To Board" is attached.
5. Letter to Mr. E.E. Campbell, Avtex Fibers, Inc., from Mr. K.R. Hinkle, Virginia State Water Control Board, re: Response to compliance schedule submitted on October 14, 1983 for providing an alternative water source to affected residents, 10/26/83. P. 100010-100013. A compliance schedule is attached.
6. Letter to Mr. Darrius [sic] Ostrauskus, U.S. EPA, from Mr. Khizar Wasti, Virginia Department of Health, re: Well water analysis, 11/16/83. P. 100014-100016. A partial letter regarding information on toxicity of well water is attached.
7. Memorandum to file from Mr. Darius Ostrauskas, U.S. EPA, re: Avtex Fibers Site visit, 12/8/83. P. 100017-100017.

\* Administrative Record File available 6/6/88, updated 5/21/90.

Note: Company or organizational affiliation is identified in the index only when it appears in the record.

8. Letter to Mr. R.B. Chewning, Virginia State Water Control Board, from Mr. E.E. Campbell, Avtex Fibers, Inc., re: Preliminary analysis of monitoring wells, expansion of drilling program, and efforts to provide alternative water source to affected residents, 12/13/83. P. 100018-100020.
9. Handwritten memorandum to file from Mr. Darius Ostrauskas, U.S. EPA, re: Number of people served by the aquifier, 5/22/84. P. 100021-100021.
10. Handwritten memorandum to file from Mr. Darius Ostrauskas, U.S. EPA, re: Avtex Fibers' progress in addressing an open dump of viscose contaminated waste, 5/22/84. P. 100022-100022.
11. Letter to Mr. Darius Ostrauskas, U.S. EPA, from Mr. K.R. Hinkle, Virginia State Water Control Board, re: Number of people served by the aquifier of concern within a three-mile radius of Avtex, 5/31/84. P. 100023-100027. A letter regarding Groundwater Study Progress Report, a list of property owners, resident status and water status and a letter regarding Avtex's Final Closure Plan are attached.
12. Letter to Mr. Darius Ostrauskas, U.S. EPA, from Mr. K.R. Hinkle, Virginia State Water Control Board, re: Status reports generated by Avtex Fibers, Inc., on their ground water study since May 1984, 10/10/84. P. 100028-100039. The following are attached:
  - a) a letter regarding the ground water study;
  - b) a chart containing the change in ground water quality in PW2 over time;
  - c) a letter regarding a study to determine river contamination;
  - d) a letter regarding a ground water pollution study;
  - e) a letter regarding a Ground Water Study Progress Report, July 30-August 24, 1984;
  - f) information on the status of Rivermont Acres-Fiddlers Green residents;

- g) a letter regarding a Ground Water Study Progress Report, June 20-July 30, 1984;
  - h) a letter regarding a Ground Water Study Progress Report, May 17-June 20, 1984.
13. Letter to Ms. Susan Insetta, U.S. EPA, from Mr. K.R. Hinkle, Virginia State Water Control Board, re: Avtex request to revise their Hazardous Ranking System score, 1/4/85. P. 100040-100063. The following are attached:
- a) a letter regarding a ground water pollution study;
  - b) a letter regarding comments on the proposed second update to the National Priorities List;
  - c) a transmittal letter of analysis ran on ground water samples;
  - d) a certificate of analysis;
  - e) a letter regarding Mr. C. Ray Enicks as Plant Manager of Avtex Fibers;
  - f) a letter regarding a Ground Water Study Progress Report, November 1984;
  - g) a list of laboratories used by Avtex Fibers for ground water sampling;
  - h) an additional monitoring proposal;
  - i) a status of Rivermont Acres-Fiddlers Green Residents list;
  - j) a letter regarding the ground water contamination problem in Front Royal;
  - k) a letter regarding additional ground water analysis;
  - l) a map of locations of monitoring and pumping wells;
  - m) a letter regarding the Ground Water Study Progress Reports, October 1984;

- n) a table of sample results;
  - o) a hand-drawn site map;
  - p) a letter regarding the ground water pollution study.
14. Memorandum to file from Mr. William L. Walsh, U.S. EPA, re: Avtex Fibers, Inc. trip report, 8/6/85. P. 100064-100068. Two handwritten tables of viscose basin results are attached.
15. Report: Preliminary Assessment/Site Inspection Using Available Information, Avtex Fibers, Inc., prepared by NUS Corporation, 8/28/86. P. 100069-100157.

## II. REMEDIAL ENFORCEMENT PLANNING

1. Memorandum to Mr. H.S. Hall, Avtex Fibers, Inc., from Mr. R.M. Biggs, Jr., Avtex Fibers, Inc., re: Amended NPDES Permit, 11/9/76. P. 200001-200015. A letter regarding the amendment of VA-NPDES Permit No. VA0002208, a memorandum regarding the amendment and change in ownership of VA-NPDES Permit No. VA0002208, and an Authorization to Discharge Under the National Pollutant Discharge Elimination System and the Virginia State Water Control Law are attached.
2. Memorandum to Mr. A.G. Ruff, Jr., Avtex Fibers, Inc., from Mr. R.M. Biggs, Jr., Avtex Fibers, Inc., re: Solid waste which falls under hazardous waste definition, 8/29/78. P. 200016-200016.
3. Memorandum to Mr. Ruff and Mr. Hall, Avtex Fibers, Inc., from Mr. R.M. Biggs, Jr., Avtex Fibers, Inc., re: Resource Conservation and Recovery Act (RCRA), 3/21/80. P. 200017-200018.
4. Memorandum to Mr. R.M. Biggs, Avtex Fibers, Inc., from Mr. J.D. Ringer, Avtex Fibers Inc., re: Identification and disposal of scrap chemicals, 5/19/80. P. 200019-200019.
5. Table: Solid Waste Inventory for Front Royal Plant, 7/1/80. P. 200020-200022.
6. Memorandum to Mr. E.E. Campbell, Avtex Fibers, Inc., from Mr. R.M. Biggs, Jr., Avtex Fibers, Inc., re: EPA Notification of Hazardous Waste Activity, 8/13/80. P. 200023-200024.
7. Letter to Mr. Richard J. Criqui, Jr., Virginia State Water Control Board, from Mr. R.M. Biggs, Jr., Avtex Fibers, Inc., re: Location and frequency of monitoring wells, 10/23/80. P. 200025-200026.
8. Handwritten memorandum to Mr. Jim Ringer, Avtex Fibers Inc., from Mr. R.M. Biggs, Avtex Fibers Inc., re: Disposition of drum chemicals, 10/28/80. P. 200027-200028.
9. Letter to Mr. H.L. Rexrode, Virginia State Department of Health, from Mr. R.M. Biggs, Jr., Avtex Fibers, Inc., re: Application for a Hazardous Waste Permit,

Forms 1 and 3, 11/11/80. P. 200029-200037. The application is attached.

10. Handwritten memorandum to Mr. Jim Ringer, Avtex Fibers Inc., from Mr. R.M. Biggs, Avtex Fibers Inc., re: Excess chemicals update, 12/15/81. P. 200038-200041. A memorandum regarding excess chemicals update from October 14, 1981 is attached.
11. Letter to Ms. Lauren Fillmore, Avtex Fibers, Inc., from Mr. John C. Kendall, PPG Chemical Industries, re: Hazardous and safe handling of Food Chemicals, 3/30/82. P. 200042-200043. A list of Sodium Hydroxide Specifications from Food Chemicals Codex is attached.
12. Memorandum to Mr. J. Ringer, Avtex Fibers, Inc., from Mr. R.M. Biggs, Jr., Avtex Fibers, Inc, re: Excess chemicals, 4/8/82. P. 200044-200044.
13. Letter to Mr. Harlan Rexrode, Virginia State Department of Health, from Mr. R.M. Biggs, Avtex Fibers, Inc., re: Submission of closure plans for the present landfill, for viscose basins and for fly ash basins, 7/29/82. P. 200045-200050. The following are attached:
  - a) a closure plan for present landfill;
  - b) a closure plan for viscose basins;
  - c) a closure plan for fly ash basins;
  - d) a facility map.
14. Memorandum to Mr. C.A. Zarroli, Avtex Fibers, Inc., from Mr. A.G. Ruff, Jr., Avtex Fibers, Inc., re: Front Royal ground water pollution, 6/7/83. P. 200051-200060. A meeting agenda and a ground water pollution report are attached.
15. Memorandum to Mr. R.H. Hughes, Avtex Fibers, Inc., from Mr. A.G. Ruff, Jr., Avtex Fibers, Inc., re: Minutes from the September 27, 1983 State Water Control Board meeting, 10/4/83. P. 200061-200062.
16. Letter to Mr. Ken Hinkle, Virginia State Water Control Board, from Ms. Lauren Fillmore, Avtex Fibers, Inc., re: Phase IIb Report, 3/15/84. P. 200063-200065.
17. Letter to Mr. J.N. Gregg, Avtex Fibers, Inc., from Mr. Stephen R. Wassersug, U.S. EPA, re: EPA consideration to spend public funds to investigate and take

corrective action at the Avtex Site, 1/30/85.  
P. 200066-200068.

18. Letter to Ms. Judith Dorsey and Mr. Gregg H. Crystall, U.S. EPA, from Ms. Mariam G. Matrangola, Avtex Fibers, Inc., re: 106 notice letter, 2/13/85. P. 200069-200070.
19. Letter to Mr. Robert Malott, FMC Corporation, from Mr. Stephen R. Wassersug, U.S. EPA, re: Notification of potential liability, 3/8/85. P. 200071-200076. A handwritten note regarding addition of a document to a list is attached.
20. Letter to Ms. Judith Dorsey and Mr. Gregg H. Crystall, U.S. EPA, from Mr. John Hoefer, FMC Corporation, re: Response to 106 letter from EPA, 4/15/85. P. 200077-200077.
21. Letter to Mr. Gregg H. Crystall. U.S. EPA, from Mr. K.R. Hinkle, Virginia State Water Control Board, re: EPA as lead agency in handling cleanup of the ground water pollution problem, 8/6/85. P. 200078-200082. A letter regarding executing the Consent Order and a letter regarding the signing of the consent order are attached.
22. Memorandum to Mr. James M. Seif, U.S. EPA, from Mr. Stephen R. Wassersug, U.S. EPA, re: Amended CERCLA 106(a) Administrative Order of Consent for a Remedial Investigation/Feasibility Study at the Avtex Fibers Site, 1/27/88. P. 200083-200083.
23. Letter to Mr. Robert McManus, FMC Corporation, from Mr. Bruce P. Smith, U.S. EPA, re: 107 Notice letter, 10/25/88. P. 200084-200085.
24. Letter to Mr. John Gregg, Avtex Fibers, Inc., from Mr. Bruce P. Smith, U.S. EPA, re: 107 Notice letter, 10/25/88. P. 200086-200087.
25. Letter to Mr. John Gregg, Avtex Fibers Inc., from Mr. Bruce P. Smith, U.S. EPA, re: Notification that EPA may spend additional public funds to further investigate and control releases, 10/26/88. P. 200088-200089.

26. Letter to Mr. John Gregg, Avtex Fibers, Inc., from Ms. Ruth Rzepski, U.S. EPA, re: Copies of notice letters sent to Avtex Fibers, 11/2/88. P. 200090-200090.
27. Letter to Mr. Robert J. McManus, FMC Corporation, from Mr. Henry H. Sprague, U.S. EPA, re: Draft amendments of the Consent Order (undated). P. 200091-200106. The Administrative Order By Consent, Amended Order is attached.



### III. REMEDIAL RESPONSE PLANNING

1. Letter to Mr. Ken Hinkle, Virginia State Water Control Board, from Mr. C.R. Enicks, Avtex Fibers, Inc., re: Avtex Fibers Inc.'s response to EPA's March 21, 1985 letter, 4/3/85. P. 300001-300002.
2. Memorandum to file from Mr. Gregg Crystall, U.S. EPA, re: Site visit on June 11, 1985, 6/18/85. P. 30003-300003.
3. Memorandum to Mr. Gregg Crystall, U.S. EPA, from Mr. Bruce Molholt, U.S. EPA, re: Carbon disulfide toxicity at the Avtex Fibers Site, 7/10/85. P. 300004-300005.
4. Letter to Mr. Gregg H. Crystall, U.S. EPA, from Mr. K.R. Hinkle, Virginia State Water Control Board, re: Concerns about a solution to the ground water pollution problem after the review of the Remedial Investigation/Feasibility Study Work Plan, 8/7/85. P. 300006-300007.
5. Letter to Mr. Robert H. Kirby, Virginia Department of Planning and Budget, from Ms. Kathryn Hodgkiss, U.S. EPA, re: Funding of a proposed Superfund project, 9/25/85. P. 300008-300009.
6. Letter to Mr. Gregg Crystall, U.S. EPA, from Ms. Cynthia A. Martin, Virginia State Water Control Board, re: Comments on the proposed site, 10/29/85. P. 300010-300010.
7. Report: Remedial Investigation/Feasibility Study Work Plan, Avtex Fibers, Inc., Front Royal, Virginia, prepared by Geraghty and Miller, Inc., 3/86. P. 300011-300386.
8. Letter to Ms. Judith A. Dorsey, U.S. EPA, from Mr. R.H. Hughes, Avtex Fibers, Inc., re: Transmittal of revised draft Work Plan, 3/17/86. P. 300387-300387.
9. Letter to Mr. Jim Miller, U.S. EPA, from Mr. K.R. Hinkle, Virginia State Water Control Board, re: Additional comments to the Remedial Investigation/Feasibility Work Plan, 4/25/86. P. 300388-300389.
10. Handwritten memorandum to file from Mr. Jim Miller, U.S. EPA, re: Telephone conversation with Mr. Mark Wagner discussing how the Work Plan will address the

possible leakage into the river, 5/2/86. P. 300390-300390.

11. Handwritten retroactive memorandum to file from Mr. Jim Miller, U.S. EPA, re: Avtex technical meeting on April 30, 1986 discussing comments on the RI/FS Work Plan, 6/2/86. P. 300391-300392. A handwritten attendance list is attached.
12. Letter to Mr. Richard H. Hughes, Avtex Fibers, Inc., from Mr. Dennis Carney, U.S. EPA, re: Revisions to the RI/FS Work Plan, 6/18/86. P. 300393-300393.
13. Letter to Mr. Mark Wagner, Geraghty & Miller, Inc., from Mr. Dennis Carney, U.S. EPA, re: Comments on the Remedial Investigation/Feasibility Study, 11/17/86. P. 300394-300395.
14. Letter to Mr. Michael R. Pisarcik, Avtex Fibers, Inc., from Mr. Dennis Carney, U.S. EPA, re: Response to EPA's request of October 14, 1986, 11/26/86. P. 300396-300396.
15. Letter to Mr. R.H. Hughes, Avtex Fibers, Inc., from Mr. Dennis Carney, U.S. EPA, re: Request for a meeting to discuss sections 121(a), 121(d), and 104(d) of the Superfund Amendments and Reauthorization Act (SARA) of 1986, 12/30/86. P. 300397-300399. A certified mail receipt is attached.
16. Report: Quality Assurance/Quality Control, Remedial Investigation/Feasibility Study, Avtex Fibers, Inc., Front Royal, Virginia, Revision 1, prepared by Geraghty and Miller, Inc., 1/1/87. P. 300400-300538.
17. Report: Sampling and Analysis Plan, Remedial Investigation/Feasibility Study, Avtex Fibers, Inc., Front Royal, Virginia, Revision 1, prepared by Geraghty and Miller, Inc., 1/9/87. P. 300539-300807.
18. Report: Health and Safety Plan, Remedial Investigation/Feasibility Study, Avtex Fibers, Inc., Front Royal, Virginia, Revision 1, prepared by Geraghty and Miller, Inc., 1/9/87. P. 300808-300922.
19. Letter to Mr. James Miller, U.S. EPA, from Mr. Richard H. Hughes, Avtex Fibers, Inc., re: Explanation of SARA, 1/26/87. P. 300923-300925. A letter requesting a meeting to discuss sections 121(a), 121(d), and 104(d) of SARA is attached.

20. Letter to Mr. Mark Wagner, Geraghty & Miller, Inc., from Mr. Dennis P. Carney, U.S. EPA, re: Comments on the Sampling Quality Assurance/Quality Control, and Health and Safety Plans, 3/16/87. P. 300926-300928.
21. Letter to Mr. James Miller, U.S. EPA, from Mr. Mark E. Wagner, Geraghty & Miller, Inc., re: Modification to the survey conducted on Avtex Property, 5/18/87. P. 300929-300929.
22. Memorandum to Mr. James Miller, U.S. EPA, from Mr. H. Ronald Preston, U.S. EPA, re: Comments and recommendations from the Bioassessment Work Group review, 6/1/87. P. 300930-300930.
23. Letter to Ms. Ruth Rzepski, U.S. EPA, from Mr. Mark E. Wagner, Geraghty & Miller, Inc., re: Suspension of all counter-pumping activities, 6/9/87. P. 300931-300931.
24. Letter to Mr. Mark E. Wagner, Geraghty and Miller, Inc., from Mr. K. R. Hinkle, Virginia State Water Control Board, re: Suspending pumping the recovery wells, 6/12/87. P. 300932-300932.
25. Letter to Mr. Mark Wagner, Geraghty & Miller, Inc., from Mr. Dennis P. Carney, U.S. EPA, re: Dismantling of well series for a six to eight week period, 6/17/87. P. 300933-300933.
26. Report: Quality Assurance Project Plan for Avtex Fibers Site, Front Royal, Virginia, prepared by Geraghty and Miller, Inc., 7/87. P. 300934-300995.
27. Letter to Ms. Ruth Rzepski, U.S. EPA, from Mr. Mark E. Wagner, Geraghty and Miller Inc., re: Modifications to the bench-scale treatability study, 7/16/87. P. 300996-300996.
28. Letter to Ms. Ruth Rzepski and Ms. Diana Pickens, U.S. EPA, from Ms. Michele C. Ruth and Mr. Jeffrey P. Sgambat, Geraghty and Miller, Inc., re: Deletion of the solubility range test for the viscose basin samples, 7/30/87. P. 300997-300997.
29. Memorandum to Ms. Ruth Rzepski, U.S. EPA, from Ms. Diana Pickens, U.S. EPA, re: Comments on additional submissions (July 1-July 31, 1987) for Avtex Fibers Site, 8/3/87. P. 300998-301000. A table on Minimum

Performance Criteria to Determine Technical Adequacy is attached.

30. Letter to Mr. Jeffrey P. Sgambat, Geraghty and Miller, Inc., from Mr. Dennis P. Carney, U.S. EPA, re: Review of the supplemental information for the Sampling and Analysis and Quality Assurance/Quality Control Plans, 8/6/87. P. 301001-301002.
31. Letter to Ms. Ruth Rzepski, U.S. EPA, from Mr. Mark E. Wagner and Mr. Jeffrey P. Sgambat, Geraghty and Miller, Inc., re: Existing deadline for the submission of the draft Remedial Investigation Report, 8/12/87. P. 301003-301003.
32. Letter to Ms. Ruth Rzepski, U.S. EPA, from Ms. Michele C. Ruth and Mr. Jeffrey C. Sgambat, Geraghty and Miller, Inc., re: Modifications to the Quality Assurance/Quality Control Plan, 8/21/87. P. 301004-301004.
33. Memorandum to Ms. Mindi Snoparsky, U.S. EPA, from Ms. Kim A. Kariya, U.S. EPA, re: Comments on the electrical resistivity surveys, 8/24/87. P. 301005-301008.
34. Report: Evaluation Report of the Geophysics Survey Report (Task 5), Avtex Fibers Site, Front Royal, Virginia, prepared by EBASCO Services, Inc., 8/28/87. P. 301009-301024.
35. Letter to Mr. Michael Pisarcik, Avtex Fibers Inc., from Mr. Dennis P. Carney, U.S. EPA, re: Response to request for additional time for the submission of the draft Remedial Investigation report, 9/3/87. P. 301025-301025.
36. Letter to Mr. Michael Pisarcik, Avtex Fibers Inc., from Mr. Dennis P. Carney, U.S. EPA, re: Final modifications to the Sampling and Analysis and Quality Assurance/Quality Control Plans, 9/3/87. P. 301026-301026.
37. Letter to Mr. Michael Pisarcik, Avtex Fibers Inc., from Mr. Dennis P. Carney, U.S. EPA, re: Review of the geophysical report, 9/4/87. P. 301027-301028.
38. Memorandum to Ms. Ruth Rezeyski [sic], U.S. EPA, from Mr. Daniel K. Donnelly, U.S. EPA, re: Analytical

reports for Avtex Fibers and sampling procedures, 9/30/87. P. 301029-301054. The following are attached:

- a) memorandum regarding NO3N results;
- b) a memorandum regarding Hydrogen Sulfide results;
- c) a memorandum regarding Volatile Organics Analysis;
- d) a Volatile Organics Analysis Report;
- e) a memorandum regarding inorganic results for Avtex Fibers;
- f) a chart containing analytical results for Avtex Fibers;
- g) a memorandum on phenol and total organic carbon determinations;
- h) two Chain of Custody records.

- 39. Letter to Ms. Ruth Rzepski and Ms. Diana Pickens, U.S. EPA, from Mr. Mark E. Wagner, Geraghty and Miller, Inc., re: Comments on the Work Plans, 7/1/87. P. 301055-301111. A letter regarding comments on Appendix D, Revisions to the Sampling and Analysis Plan and Appendix D, Revisions to the Quality Assurance/Quality Control Plan, a memorandum regarding review of 4/23/87 revisions to Avtex Fibers Inc. Work Plans, and a report on Comments 1 and 2 - Quality Control Documentation for Avtex Laboratory are attached.
- 40. Letter to Ms. Ruth Rzepski and Ms. Diana Pickens, U.S. EPA, from Ms. Michele C. Ruth and Mr. Jeffrey P. Sgambat, Geraghty and Miller, Inc., re: Revision of responses to comments 1 and 2, 7/31/87. P. 301112-301128. The revised comments are attached.
- 41. Report: Remedial Investigation Report, Volumes I, II, and III, Interim, Final Report, Administrative Order on Consent, Remedial Investigation/ Feasibility Study, Avtex Fibers, Inc., Front Royal, Virginia, prepared by Geraghty and Miller, Inc., 2/88. P. 301129-302406.

42. Report: Field Investigation Summary Document, Administrative Order on Consent, Remedial Investigation/Feasibility Study, Avtex Fibers, Inc., Front Royal, Virginia, prepared by Geraghty & Miller, Inc., 2/88. P. 302407-303807. A transmittal letter is attached.
43. Letter to Ms. Ruth Rzepski, U.S. EPA, from Mr. James A. Adams, Virginia Department of Waste Management, re: Comments on the Draft Feasibility Study, 5/25/88. P. 303808-303810.
44. Memorandum to Ms. Diana Baldi, U.S. EPA, from Mr. Mila Javellana, Weston, Inc., re: Evaluation of Bench Scale Treatability Study, 6/8/88. P. 303811-303883. Attachment A, Inorganic Data Validation, and Attachment B, Organic Data Validation, are attached.
45. Memorandum to Ms. Ruth Rzepski, U.S. EPA, from Ms. Diana Baldi, U.S. EPA, re: Review of PRP Treatability Study Data, 6/13/88. P. 303884-303884.
46. Memorandum to Ms. Ruth Rzepski, U.S. EPA, from Mr. Peter Stokely, U.S. EPA, re: Wetlands assessment, 8/10/88. P. 303885-303889. Figure 3, Generalized Basin Location Map is attached.
47. Letter to Ms. Ruth Rzepski, U.S. EPA, from Mr. W.L. Kregloe, Virginia State Water Control Board, re: Proposal to direct the collected ground water to the Industrial Wastewater Treatment Plant for treatment prior to discharge, 8/18/88. P. 303890-303891.
48. Letter to Ms. Ruth Rzepski, U.S. EPA, from Mr. James A. Adams, Virginia Department of Waste Management, re: Comments on the revised draft Feasibility Study, 8/18/88. P. 303892-303895.
49. Letter to Mr. R.H. Hughes, Avtex Fibers Inc., from Ms. Ruth Rzepski, U.S. EPA, re: Consent Order for the Remedial Investigation/Feasibility Study, 8/22/88. P. 303896-303897.
50. Letter to Mr. R.H. Hughes, Avtex Fibers, Inc., from Ms. Ruth Rzepski, U.S. EPA, re: Comments on the Remedial

Investigation/Feasibility Study, 8/25/88. P. 303898-303898.

51. Letter to Ms. Ruth Rzepski, U.S. EPA, from Mr. Richard G. Smith, G & M Consulting Engineers, Inc., and Mr. Peter L. Palmer, G & M Consulting Engineers, Inc., re: Transmittal of the Interim Final Report, Feasibility Study, Administrative Order on Consent, Remedial Investigation/Feasibility Study, 8/25/88. P. 303899-304168. The report is attached.
52. Memorandum to Ms. Ruth Rzepski, U.S. EPA, from Mr. Bruce Molholt, U.S. EPA, re: Comments on the review of the Avtex Risk Assessment, 8/31/88. P. 304169-304170.
53. Letter to Ms. Ruth Rzepski, U.S. EPA, from Mr. Robert B. Ambrose, Jr., U.S. EPA, re: Response to the request for technical assistance and expert opinions as to possible degradation processes which can occur at the site, 8/31/88. P. 304171-304176. A Preliminary Evaluation of Degradation Pathways at the Avtex Fibers, Front Royal Site is attached.
54. Memorandum to Ms. Ruth Rzepski, U.S. EPA, from Ms. Linda O. Hanley, U.S. EPA, re: Reasons why existing wastewater treatment plant Outfall 004 should not be utilized to clean up groundwater, 8/20/88. P. 304177-304178.
55. Memorandum to file from Ms. Ruth Rzepski, U.S. EPA, re: Draft Feasibility Study Report treatment options, 8/29/88. P. 304179-304179.
56. Letter to Ms. Ruth Rzepski, U.S. EPA, from Mr. Robert B. Ambrose, Jr., U.S. EPA, re: Response to request for technical assistance and opinion concerning possible degradation processes at the site, 8/31/88. P. 304180-304185. A Preliminary Evaluation of Degradation Pathways Report is attached.
57. Memorandum to Ms. Ruth Rzepski, U.S. EPA, from Ms. Gail Caron, U.S. EPA, re: Presence of zinc and sulfate in site ground water, 9/12/88. P. 304186-304186.
58. Letter to Ms. Ruth Rzepski, U.S. EPA, from Mr. R.H. Hughes, Avtex Fibers, Inc., re: Response to the

Proposed Remedial Action Plan, 9/20/88. P. 304187-304187.

59. Memorandum to Ms. Ruth Rzepiski, U.S. EPA, from Mr. Dave Seter, U.S. EPA, re: Comments on Avtex Fibers OUI ROD, 9/21/88. P. 304188-304188.
60. Letter to Ms. Ruth Rzepiski, U.S. EPA, from Mr. Robert J. McManus, FMC Corporation, re: FMC Corporation's comments on the Proposed Remedial Action Plan (PRAP), 9/26/88. P. 304189-304192.
61. Letter to Mr. Stephen R. Wassersug, U.S. EPA, from Ms. Cynthia V. Bailey, Virginia Department of Waste Management, re: Comments on the Remedial Alternative, 9/26/88. P. 304193-304193.
62. Letter to Mr. R.H. Hughes, Avtex Fibers, Inc., and Mr. Robert McManus, FMC Corporation, from Ms. Ruth Rzepiski, U.S. EPA, re: EPA request for sampling of well numbers 187, 199, 201, and 178, 10/12/88. P. 304194-304194.
63. Memorandum to Ms. Ruth Rzepiski, U.S. EPA, from Ms. Gail Caron, U.S. EPA, re: Hydrolysis of CS<sub>2</sub>, 8/12/88. P. 304195-304195.
64. Memorandum to Ms. Ruth Rzepiski, U.S. EPA, from Ms. Linda O. Hanley, U.S. EPA, re: Existing wastewater treatment plant Outfall 004, 8/20/88. P. 304196-304197.
65. Memorandum to file from Ms. Ruth Rzepiski, U.S. EPA, re: Proposed modifications to existing wastewater treatment plant, 8/29/88. P. 304198-304198.
66. Letter to Ms. Ruth Rzepiski, U.S. EPA, from Mr. Robert B. Ambrose, Jr., U.S. EPA, re: Response to request for assistance and opinion concerning possible degradation processes which can occur at the site, 8/31/88. P. 304199-304204. A report entitled "Preliminary Evaluation of Degradation Pathways at the Avtex Fibers, Front Royal Site" is attached.
67. Memorandum to Ms. Ruth Rzepiski, U.S. EPA, from Mr. Bruce Molholt, U.S. EPA, re: Comments on the review of the Avtex Risk Assessment, 8/31/88. P. 304205-304207.



68. Memorandum to Ms. Ruth Rzepski, U.S. EPA, from Ms. Gail Caron, U.S. EPA, re: Presence of zinc and sulfate in the site groundwater, 9/12/88. P. 304208-304208.
69. Record of Decision, Declaration for Avtex Fibers NPL Site - Operable Unit One, 9/30/88. P. 304209-304272.
70. Memorandum to Mr. Jon Horin, Virginia Department of Waste Management, from Ms. Deanna Sampson, Virginia Department of Waste Management, re: ARARs for Avtex Fibers, 10/5/88. P. 304273-304274.
71. Memorandum to Mr. Jon Horin, Virginia Department of Waste Management, from Ms. Deanna Sampson Byrne [sic], Virginia Department of Waste Management, re: A list of endangered species which may be affected by activity at Avtex Fibers, 12/7/88. P. 304275-304275.
72. Memorandum to file from Mr. Gregg Crystall, U.S. EPA, re: Avtex Fibers Inc. meeting on January 30, 1985, (undated). P. 304276-304277.

#### IV. REMOVAL RESPONSE PROJECTS

1. Pollution Report #1, Avtex Fibers, 9/26/89. P. 400001-400002.
2. Special Bulletin A, Avtex Fibers, 9/26/89. P. 400003-400006.
3. Pollution Report #2, Avtex Fibers, 9/26/89. P. 400007-400008.
4. Pollution Report #3, Avtex Fibers, 9/27/89. P. 400009-400011.
5. Pollution Report #4, Avtex Fibers, 9/28/89. P. 400012-400013.
6. Pollution Report #5, Avtex Fibers, 9/29/89. P. 400014-400015.
7. Pollution Report #6, Avtex Fibers, 9/30/89. P. 400016-400016.
8. Pollution Report #7, Avtex Fibers, 10/01/89. P. 400017-400018.

9. Pollution Report #8, Avtex Fibers, 10/03/89.  
P. 400019-400020.
10. Pollution Report #9, Avtex Fibers, 10/04/89.  
P. 400021-400022.
11. Pollution Report #10, Avtex Fibers, 10/04/89.  
P. 400023-400025.
12. Pollution Report #11, Avtex Fibers, 10/06/89.  
P. 400026-400028.
13. Pollution Report #12, Avtex Fibers, 10/08/89.  
P. 400029-400031.
14. Pollution Report #13, Avtex Fibers, 10/08/89.  
P. 400032-400033.
15. Pollution Report #14, Avtex Fibers, 10/09/89.  
P. 400034-400035.
16. Pollution Report #15, Avtex Fibers, 10/09/89.  
P. 400036-400037.
17. Pollution Report #16, Avtex Fibers, 10/11/89.  
P. 400038-400040.
18. Pollution Report #17, Avtex Fibers, 10/11/89.  
P. 400041-400042.
19. Pollution Report #18, Avtex Fibers, 10/12/89.  
P. 400043-400044.
20. Pollution Report #19, Avtex Fibers, 10/13/89.  
P. 400045-400046.
21. Pollution Report #20, Avtex Fibers, 10/14/89.  
P. 400047-400048.
22. Pollution Report #21, Avtex Fibers, 10/15/89.  
P. 400049-400050.
23. Pollution Report #22, Avtex Fibers, 10/16/89.  
P. 400051-400052.
24. Pollution Report #23, Avtex Fibers, 10/19/89.  
P. 400053-400053.

25. Special Bulletin B, Avtex Fibers, 10/20/89.  
P. 400054-400055.
26. Pollution Report #26, Avtex Fibers, 10/22/89.  
P. 400056-400057.
27. Pollution Report #27, Avtex Fibers, 10/25/89.  
P. 400058-400059.
28. Pollution Report #28, Avtex Fibers, 10/25/89.  
P. 400060-400061.
29. Report: Response Measures Work Plan, Volume I, Administrative Order, Docket No. III-90-010-DC, Front Royal, Inc, Avtex Fibers Site, prepared by Avtex Fibers Front Royal Inc., 11/7/89. P. 400062-400243.
30. Report: Response Measures Work Plan, Volume II, Administrative Order, Docket No. III-90-010-DC, Avtex Fibers Front Royal, Inc., Avtex Fibers Site, prepared by Avtex Fibers Front Royal Inc., 11/7/89. P. 400244-400675.
31. Report: Response Measures Work Plan, Volume III, Administrative Order, Docket No. III-90-010-DC, Avtex Fibers Front Royal, Inc., Avtex Fibers Site, prepared by Avtex Fibers Front Royal Inc., 11/7/89. P. 400676-401175.
32. Memorandum to Mr. Jonathan Z. Cannon, Mr. Henry L. Longest, Mr. Timothy Fields, Jr., U.S. EPA, from Mr. Edwin Erickson, U.S. EPA, re: Request for approval on removal action, 11/11/89. P. 401176-401186.
33. Special Bulletin C, Avtex Fibers, 11/13/89. P. 401187-401189.
34. Memorandum to Mr. Edwin B. Erickson and Mr. Thomas C. Voltaggio, U.S. EPA, from Mr. Robert E. Caron, U.S. EPA, re: Request for approval on the two million dollar exemption and funding increase, 1/5/90. P. 401190-401209. A memorandum regarding a request for additional funding, site photographs, and nine site maps are attached.

V. COMMUNITY INVOLVEMENT/CONGRESSIONAL CORRESPONDENCE/IMAGERY

1. Press Release from U.S. EPA Environmental News, entitled "EPA Orders Clean-up of Contamination at Avtex Fibers Site, Front Royal, VA," 9/5/86. P. 500001-500001.
2. Report: Community Relations Plan, Avtex Fibers Site, Front Royal, Warren County Virginia, prepared by EBASCO Services, Inc., 3/31/87. P. 500002-500021.
3. Report: The Citizens' Guidance Manual For The Technical Assistance Grant Program, prepared by U.S. EPA, 6/3/88. P. 500022-500342.

## SITE SPECIFIC GUIDANCE DOCUMENTS

1. Memorandum to Ms. Ruth Rzepski, U.S. EPA, from Mr. Jackson Ellington, U.S. EPA, re: Transmittal of literature regarding chemical formations and reactions, 9/13/88. The following are attached:
  - a) an article entitled "Kinetics of Hydrolysis and Oxidation of Carbon Disulfide by Hydrogen Peroxide in Alkaline Medium and Application to Carbonyl Sulfide";
  - b) an article entitled "Reaction of Carbon Disulfide with Sodium Hydroxide";
  - c) an article entitled "Potentiometric Titration of Viscose";
  - d) an article entitled "Ripening Reactions of Viscose";
  - e) an article entitled "Sodium Dithiocarbonate as a By-Product in Xanthating Reactions: A Contribution to the Chemistry of Viscose";
  - f) an article entitled "Carbonyl Sulfide and Carbon Disulfide Emissions from Temperate and Boreal Forest Soils";
  - g) an article entitled "Carbon Disulfide";
  - h) an article entitled "Polysaccharides";
  - i) an article entitled "Addition to Cumulated Unsaturated Systems".
2. Memorandum to Waste Management Division Directors, Regions I, IV, V, VII, and VIII, Emergency and Remedial Response Division Director, Region II, Hazardous Waste Management Division Directors, Region III, VI, and IX, Hazardous Waste Division Director, Region X, from Mr. Henry L. Longest II, U.S. EPA, re: Guidance on remedial actions for Superfund sites with PCB Contamination/Superfund management review: Recommendation 23, 8/15/90. The following are attached:

- a) guidance on remedial actions for Superfund sites with PCB contamination;
- b) "Short Sheet" -- A guide on remedial actions at Superfund Sites with PCB contamination;
- c) joint memorandum: "PCB Contamination at Superfund Sites -- Relationship of TSCA Anti-Dilution Provision to Superfund Response Actions".

GENERAL GUIDANCE DOCUMENTS \*

1. "Interim Priorities List," Federal Register, 10/23/81.
2. "Expanded Eligibility List," Federal Register, 7/82.
3. "Proposal of First National Priority List," Federal Register, 12/30/82.
4. Community Relations in Superfund: A Handbook (interim version), 9/83.
5. "Proposal of Update 1," Federal Register, 9/8/83.
6. Memorandum to U.S. EPA from Mr. William Heckman, Jr. entitled "Transmittal at Superfund Removal Procedures - Revision 2," 8/20/84.
7. EPA Groundwater Protection Strategy, 9/84.
8. "Proposal of Update 2," Federal Register, 10/15/84.
9. Memorandum to Mr. Jack McGraw entitled "Community Relations Activities at Superfund Sites - Interim Guidance," 3/22/85.
10. "Proposal of Update 3," Federal Register, 4/10/85.
11. Guidance on Remedial Investigations under CERCLA, 6/85.
12. Guidance on Feasibility Studies under CERCLA, 6/85.
13. Memorandum to Toxic Waste Management Division Directors Regions I-X from Mr. William Hedeman and Mr. Gene Lucero, re: Policy on Floodplains and Wetlands Assessments for CERCLA Actions, 8/6/85.
14. Groundwater Contamination and Protection, prepared by Mr. Donald V. Feliciano, 8/28/85.
15. Memorandum to U.S. EPA from Mr. Gene Lucero, re: Community relations at Superfund enforcement sites, 8/28/85.
16. "Proposal of Update 4" Federal Register, 9/18/85.

\* Documents are located at the U.S. EPA Region III Headquarters in Philadelphia, Pennsylvania.

17. "Promulgation of Sites from Updates 1-4," Federal Register, 6/10/86.
18. Superfund Public Health Evaluation Manual, 10/86.
19. CERCLA Compliance with Other Laws Manual, 5/88.
20. Guidance for Conducting Remedial Investigations and Feasibility Studies under CERCLA - Interim Final, prepared by the U.S. EPA Office of Energy and Remedial Response, 8/88.